

THE HONORABLE RICARDO S. MARTINEZ

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

QUNESHIA RAWLS, individually and on
behalf of all others similarly situated,

Plaintiffs,

v.

CONVERGENT OUTSOURCING, INC.,

Defendant.

Case No. 2:20-cv-01538-RSM

**JOINT STIPULATION TO EXTEND
DEADLINE FOR DEFENDANT TO
RESPOND TO PLAINTIFF'S
COMPLAINT**

I. STIPULATION

Pursuant to LCR 7, Plaintiff QUNESHIA RAWLS and the opt-in Plaintiffs, by and through their counsel, Frank Freed Subit & Thomas, LLP and Anderson Alexander, PLLC, and Defendant CONVERGENT OUTSOURCING INC., by and through its counsel, Jackson Lewis P.C., hereby stipulate and jointly move this Court for an order extending the deadline for Defendant to file and serve its Response to Plaintiff's Complaint from January 8, 2021, to March 19, 2021, so that the parties can continue their efforts to engage in good faith efforts to explore the resolution of this action. The parties are in the process of negotiating a confidentiality agreement and exchange of documents and information to further their resolution efforts, as well as securing a date for mediation in or about May 2021, in the event their direct efforts at negotiating a resolution fail.

The parties stipulate that good cause exists under LCR 7, Fed. R. Civ. P 16(b)(2), and LCR 16(b) to continue the above-referenced deadlines because the parties have agreed to engage in a near term, good faith exploration of a resolution of this matter that could obviate any further proceedings. The parties likewise stipulate that the requested extension promotes the policy supporting the voluntary resolution of disputes and preservation of judicial resources, and would facilitate an orderly administration of justice. Furthermore, Defendant's lead counsel is the sole caregiver for a family member who had lung surgery for cancer in August 2020, and who has been suffering from Covid-19 and related complications since early December 2020, with those family duties impeding the parties' ability to move forward with resolution efforts late last year, following their earlier extension.

This Stipulation is based upon the following, and the parties agree:

1. That this request is made in good faith and not for the purpose of delay.
2. That nothing in this Stipulation, nor the fact of entering the same, shall be construed as waiving any claim and/or defense held by any party.

IT IS SO STIPULATED.

DATED this 8th day of January, 2021.

FRANK FREED SUBIT & THOMAS LLP

JACKSON LEWIS P.C.

By: /s/ Michael C. Subit
 Michael C. Subit, WSBA #40801
 Marc C. Cote WSBA #39824
 705 Second Avenue, Suite 1200
 Seattle, WA 98104
 Telephone: 206-682-6711
msuib@frankfreed.com
mcote@frankfreed.com

By: /s/ Peter H. Nohle
 Peter H. Nohle, WSBA # 35849
 Daniel P. Crowner, WSBA #37136
 520 Pike Street, Suite 2300
 Seattle, WA 98101
 Telephone: 206-405-0404
Peter.Nohle@jacksonlewis.com
Daniel.Crowner@jacksonlewis.com

Attorneys for Plaintiff and Putative Class
 Members

Attorneys for Defendant

1 ANDERSON ALEXANDER, PLLC

2
3 By: /s/ Clif Alexander

4 Clif Alexander (*Pro Hac Vice*
5 *Anticipated*)

6 Texas Bar No. 24064805

7 Austin Anderson (*Pro Hac Vice*
8 *Anticipated*)

9 Texas Bar No. 24045189

10 819 N. Upper Broadway

11 Corpus Christi, TX 78401

12 Telephone: 361-452-1279

13 clif@a2xlaw.com

14 austin@a2xlaw.com

15
16 Attorneys for Plaintiff and Putative Class
17 Members

II. ORDER

Pursuant to the above stipulation, it is SO ORDERED.

DATED this 11th day of January, 2021.



RICARDO S. MARTINEZ
CHIEF UNITED STATES DISTRICT JUDGE